



We Make Quality Affordable

October 28, 2004

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements
Division of Nutritional Programs and Labeling
200 C Street SW
Washington, DC 20204

NOV 30 2004

Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Pomeratrol, a dietary supplement.

Statements being made in the labeling of Pomeratrol:

(1) Pomegranate has been shown to contain a number of powerful antioxidant compounds including polyphenolics and anthocyanidins. Pomegranate is especially high in ellagic acid, which has been shown to support healthy cellular function. NOW Pomeratrol contains Pomegranate extract, standardized to 80% polyphenols and 40% ellagic acid. In addition, Pomeratrol contains *trans*-Resveratrol, another potent antioxidant that protects cells against DNA damage and helps to sustain healthy cell cycles. NOW Pomeratrol's combination of antioxidant power and cellular protection thus provides strong support against abnormal cell growth, as well as against the effects of aging.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. NOW Foods possesses substantiation that the statements are truthful and not misleading.

Jim Roza
Director, Quality Assurance
NOW Foods
395 S. Glen Ellyn Rd.
Bloomington, IL 60108

975 0162

LET

15008

90292